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January 10, 2023

BY ECF

Honorable Rachel P. Kovner
United States District Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East, Courtroom 11C South
Brooklyn, New York 11201

Re: Hobby Lobby Stores Inc. v. Obbink (E.D.N.Y. Civil Docket No. 21-CV-3113- RPK-MMH)

Dear Judge Kovner:

We represent Plaintiff Hobby Lobby Stores, Inc. (“Hobby Lobby”) in the above-referenced action (the “Action”).

Pursuant to its Order dated October 28, 2022 (the “Order”), the Court directed (i) Hobby Lobby to serve upon Defendant Dirk Obbink (“Obbink”) on or before November 28, 2022, its motion to transfer the venue of the Action (the “Motion”); (ii) Obbink to serve any papers in opposition to the Motion upon Hobby Lobby on or before December 28, 2022; and (iii) the parties to file a fully-briefed Motion with the Court on or before January 11, 2023.

On November 25, 2022, we served Obbink with the Motion and a copy of the Order by personal service at his residence in Oxford, England pursuant to Fed. R. Civ. P. 4(f)(1) under the rules of the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents, to which the United Kingdom is a signatory. In addition, we provided Obbink with a letter explaining the deadline for his response to the Motion. We have received no papers from Obbink in response to the Motion and Obbink remains in default in the Action. Today, we filed with the Court copies of the Motion (ECF No. 15-18) and the process server’s affidavit of service (ECF No. 19).

Accordingly, we respectfully advise the Court that the Motion is ready for the Court’s consideration.

Respectfully submitted,

Pearlstein & McCullough LLP

By: /s/ Michael McCullough
Michael McCullough
Anju Uchima